

EXHIBIT 4

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16 *Co-Lead Class Counsel*

17
18 UNITED STATES DISTRICT COURT
19
20 NORTHERN DISTRICT OF CALIFORNIA
21
22 SAN JOSE DIVISION
23

24 IN RE: HIGH-TECH EMPLOYEE
25 ANTITRUST LITIGATION

26 THIS DOCUMENT RELATES TO:
27
28 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ERIC L. CRAMER IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, REIMBURSEMENT
OF EXPENSES, AND INCENTIVE AWARDS**

1 I, Eric L. Cramer, declare:

2 1. I am an attorney licensed to practice in Pennsylvania and New York. I am a
3 managing shareholder of the firm Berger & Montague, P.C. ("Berger & Montague") in
4 Philadelphia, and Counsel for the Class Representatives and for the proposed Settlement Class. I
5 have personal knowledge of the facts set forth herein and could competently testify to them if
6 called as a witness.

7 2. Forty years ago, Berger & Montague pioneered the use of class actions in antitrust
8 and securities litigation, and since then, has expanded the use of class actions in the fields of
9 consumer, employment, environmental and insurance litigation, as well as in the areas of civil and
10 human rights. Our firm's Antitrust Department has extensive experience in complex antitrust
11 class action litigation. Berger & Montague has played lead roles in major class action cases for
12 approximately 40 years, resulting in recoveries totaling billions of dollars for our firm's clients
13 and the classes they represent. I have been a managing shareholder of the firm, where I have
14 practiced since 1995. I have repeatedly been selected by Chambers USA America's Leading
15 Lawyers for Business as one of Pennsylvania's top antitrust lawyers; have been highlighted
16 annually since 2011 by the *Legal 500* as one of the country's top lawyers in the field of complex
17 antitrust litigation; have repeatedly been deemed one of the "Best Lawyers in America;" and have
18 been designated a "Super Lawyer" by Philadelphia Magazine many years in a row. I am lead
19 counsel in several antitrust and other litigation matters in a variety of industries and numerous
20 courts across the country.

21 3. To advance this litigation, Berger & Montague paid certain costs totaling
22 \$181,069.49, up through October 30, 2013 (the date of Preliminary Settlement Approval). Those
23 costs consisted of contributions to the joint litigation fund of Class Counsel ("Litigation Fund") as
24 well as costs paid separately by Berger & Montague, as set forth below.

25 4. The Litigation Fund was designed to pay common external costs, such as expert
26 fees, court reporting expenses for deposition transcripts, and vendor fees for our electronic
27 platform for review and storage of documents produced in the course of discovery. Berger &
28 Montague contributed \$140,000.00 to the Litigation Fund as-of October 30, 2013. Further details

1 regarding the Litigation Fund are described in the accompanying Declaration of Kelly M.
2 Dermody In Support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses and
3 Incentive Awards.

4 5. In addition, Berger & Montague paid separately \$41,069.49 for certain costs that
5 were not paid for by the Litigation Fund, including copying documents, travel, electronic
6 computer research, mailing charges, printing, telephone service, and other expenses. These
7 expenses are summarized in a chart provided in Attachment 1.

8 6. Berger & Montague incurred the costs described herein on behalf of Plaintiffs on a
9 contingent basis, and has not been reimbursed. The records of these costs are reflected in Berger
10 & Montague's books and records. I have reviewed the expenses reported by Berger & Montague
11 in this case that are included in the Motion for Attorneys' Fees, Reimbursement of Expenses, and
12 Incentive Awards, and I affirm that they are true and accurate.

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16 I declare under penalty of perjury under the laws of the United States and the State of
17 Pennsylvania that the foregoing is true and correct to the best of my knowledge and that this
18 declaration was executed in Philadelphia, Pennsylvania on March 4, 2014.

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Eric L. Cramer

Attachment 1
In re High-Tech Employees Antitrust Litigation
Berger & Montague, P.C.
Reported Expenses Incurred on Behalf of Plaintiffs
Inception Through October 30, 2013

Reported Expenses (By Type)	Amount Incurred
Computer Research	\$6,994.33
Copying/Reproduction	\$3,864.80
Delivery/Courier Service	\$1,401.74
Document Production Management Fees	\$1,831.11
Filing Fees	\$825.00
Postage	\$42.84
Telephone	\$107.16
Travel	\$26,002.51
Total:	\$41,069.49